Equivalent Service Hours and Cyclic Maintenance Factors

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Maintenance Expenses

- Competitive offers are equal to the short run marginal cost.
- The IMM does not agree that maintenance expenses are short run marginal costs.
- The IMM is providing the following clarification and recommendations to avoid improper accounting of maintenance costs in CTs and CCs.

Equivalent Service Hours

- Manual 15 allows the allocation of maintenance expenses using equivalent service hours for CCs/CTs.
- Equivalent service hours are used by OEM to determine when certain maintenance on the combustion turbine has to be performed. For example:
 - Combustion inspection
 - Hot gas path inspection
 - Major overhaul

Equivalent Service Hours

 Manual 15 includes a formula to calculate equivalent service hours as:

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ESH = Cyclic Starting Factor x No. of starts +
Total Operating Hours at any load level +
Cyclic Peaking Factor x No. of hours above base load
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- Manual 15 also states that only OEM cyclic factors can be used.
- In some cases, the formula in Manual 15 is inconsistent with the way that OEMs determine the maintenance intervals.

OEM Maintenance Events

- OEMs have different equations and triggers for maintenance events.
 - Some may have it based on total equivalent service hours (including starts) as in Manual 15.
 - Some may have it based on the trigger that occurs first, between number of starts or number of factored hours (i.e. similar to the Manual 15 equation but excluding starts).
 - Some may include dual fuel operation.
 - Some may include fast starts and/or trips.

- Unit A and B have 200 starts, 1,900 operating hours at base load and 20 hours at peak load (10 MW).
 - Unit A is a X model.
 - Unit B is a Y model.
- X OEM documentation states that maintenance intervals are measured in equivalent service hours and that an equivalent service hour is equal to:
 - ESH = Starts x 15 + Base Load Hours + Peak Load Hours x 5
- X OEM states that a combustion inspection should be performed every 5,000 ESH.

- The combustion inspection cost \$100,000.
- The CI cost per ESH is \$20 per ESH or
 - Every start costs \$20 x 15 (cyclic factor) = \$300
 - Every hour at base costs \$20 x 1 (base load) = \$20
 - Every hour at peak costs \$20 x 5 (peaking factor) = \$100
- In the three part offer this will be:
 - Start Cost: \$300/start
 - No Load: \$20/hour
 - Peak MW Incremental Offer: (\$100 \$20) / 10 MW = \$8/MWh

- Unit A and B have 200 starts, 1,900 operating hours at base load and 20 hours at peak load (10 MW).
 - Unit A is a X model.
 - Unit B is a Y model.
- Y OEM documentation states that maintenance intervals are measured in starts and equivalent hours.
 - Starts = No. of starts
 - Equivalent hours = Base Load Hours + Peak Load Hours x 3
- Y OEM states that a combustion inspection should be performed every 200 starts or 4,000 equivalent hours, whatever happens first.

- The combustion inspection cost \$100,000.
- Since the number of starts was triggered first, the CI cost per start is \$500. Base load or peak load hours did not trigger the maintenance event, therefore there is no CI cost associated with running at base load or peak load.
- In the three part offer this will be:
 - Start Cost: \$500/start
 - No Load: \$0/hour
 - Peak MW Offer: \$0/MWh

Issues

- The equation in Manual 15 can differ from the equation used by the OEM. Just like the cyclic factors, Manual 15 should require the use of the OEM.
- This maintenance expense allocation method should only be allowed for generators that follow the OEM equations and maintenance intervals.
- Only maintenance expenses attributed to combustion turbine (e.g. Combustor Inspection) should be allocated using this method. Other maintenance expenses (e.g. BoP, steam turbine) should not.

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